REMARKS

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. Claims 2, 6, 9, and 13 were previously cancelled. Claims 15-28 and 30 were previously withdrawn in response to a restriction requirement. Claims 5 and 8 are currently being amended. After amending the claims as set forth above, Claims 1, 3-5, 7, 8, 10-12, 14, 29, and 31-32 are now pending in this application.

I. Objection of Claim 8

In section 2 of the Office Action, Claim 8 was objected to because the claim recited "TSS" instead of "HSS." In response to this objection, Applicants have amended Claim 8 to correct the typographical error. In addition, Applicants have also amended Claim 5 to correct a typographical error. Specifically, the redundant use of "the" was removed.

II. Rejection of Claims 1, 5, 8, 12, 29, and 32 under 35 U.S.C. § 103(a)

In section 3 of the Office Action, Claims 1, 5, 8, 12, 29, and 32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,707,813 to Hasan et al. (Hasan) in view of US 6,654,606 to Foti et al. (Foti). Applicants respectfully traverse this rejection because Hasan, alone and in combination with Foti, fails to teach, suggest, or disclose all of the elements of at least Claims 1, 5, 8, 12, and 29.

A. Regarding independent Claims 1, 8, and 29

Independent Claim 1 recites in part:

> providing the TA and an address of the S-CSCF to a Home Subscription Server (HSS) for storage at the HSS; and
>
> receiving the TA from the HSS in response to a loss of the TA by the S-CSCF such that the TA is restored at the S-CSCF.

Similarly, independent Claim 8 recites in part:

> forward the TA of the subscriber and an address of the S-CSCF from the S-CSCF to a Home Subscription Server (HSS) such

> that the TA and the address of the S-CSCF are stored at the HSS; and
>
> receive, from the HSS, the TA at the S-CSCF in response to a loss of the TA by the S-CSCF.

Similarly, independent Claim 29 recites in part:

> a forwarding unit configured to forward the TA and an address of the S-CSCF from the S-CSCF to a Home Subscription Server (HSS) for storage; and
>
> a second receiving unit configured to receive the TA from the HSS in response to a loss of the TA by the S-CSCF.

Neither Hasan or Foti teaches forwarding the TA and an address of the S-CSCF to an HSS for storage, as recited in Claims 1, 8, and 29. In addition, neither Hasan or Foti teaches receiving the TA from the HSS in response to a loss of the TA by the S-CSCF, as recited in Claims 1, 8, and 29.

1. Forwarding the TA and an address of the S-CSCF to an HSS for storage

Relative to forwarding the TA for storage at the HSS, the Examiner states on page 2 of the Office Action that:

> Foti teaches a Transport Address (TA) of the subscriber providing the TA and an address of the S-CSCF to a Home Subscription Server (HSS) for storage at the HSS, and receiving the TA from the HSS in response to a loss of the TA by the S-CSCF such that the TA in restored at the S-CSCF (see column 2, lines 9-24).

At column 2, lines 13-14 cited by the Examiner, Foti states "a location server that stores a transport address for the called MS." (Emphasis added). Thus, Foti teaches that the TA is stored in a location server. Foti further states "a Home Network 26 includes a Home Subscriber Server (HSS) 27, a Home CSCF 28, and a Location Server 29." (Col. 3, lines 46-47; with emphasis added through underlining). Therefore, Foti teaches a location server, which is distinct from the HSS, "that stores a transport address for the called MS." As such, Applicants respectfully assert that Foti does not teach, suggest, or describe storage of a transport address and an address of the S-CSCF at an HSS, as recited in Claims 1, 8, and 29.

Hasan describes:

> Since MS 2 is registered with CSCF 2 , CSCF 2 responds to the LRQ with a Location Confirm (LCF) message 33 that includes the E.164 and the CSCF 2 transport address.... CFCF 1 then returns an Admission Confirm (ACF) message 34 containing its transport address and other particulars to MS 1 .

(Col. 5, lines 45-54). Thus, Hasan teaches a CSCF that sends an LCF and an ACF message including its transport address. However, Hasan fails to teach, suggest, or describe storage of a transport address at an HSS. Furthermore, Hasan does not even mention an HSS in the entire disclosure. Accordingly, Hasan also fails to teach, suggest, or describe storage of a transport address and an address of the S-CSCF at an HSS, as recited in Claims 1, 8, and 29.

2. Receiving the TA from the HSS in response to a loss of the TA by the S-CSCF.

As recited above, the Examiner asserts that Foti teaches "receiving the TA from the HSS in response to a loss of the TA by the S-CSCF such that the TA in restored at the S-CSCF (see column 2, lines 9-24)." Applicants respectfully disagree.

At column 2, lines 9-24 cited by the Examiner, with emphasis added through underlining, Foti states:

> In yet another aspect, the present invention is an all-IP network in which call processing of a call to a called MS is performed by a plurality of CSCFs. The network includes a Home Subscriber Server (HSS) that stores location information for the called MS, a location server that stores a transport address for the called MS, and a Domain Name Server (DNS) that stores an address for a Home CSCF for the called MS. A relationship function is implemented in each of the plurality of CSCFs, and determines whether any CSCF that receives a call setup message is the Home CSCF for the called MS, a Serving CSCF for the called MS, or neither a Home CSCF nor a Serving CSCF for the called MS. Each CSCF also includes defined call processing functions that are selectively performed, depending on a result determined by the relationship function.

First, as discussed above, Foti teaches storing the TA at a location server. As such, Foti cannot teach receiving the TA from the HSS (since the TA is not stored in the HSS).

Second, Foti merely relates to receiving a call setup message at a CSCF and determining whether the CSCF is the Home CSCF, the Serving CSCF, or neither. In contrast, Applicants claim receiving the TA from the HSS in response to a loss of the TA by the S-CSCF. There is simply no teaching or suggestion in Foti related to receiving a TA from a HSS in response to a loss, crash, or reset situation. Therefore, Foti fails to teach, suggest, or describe receiving the TA from the HSS in response to a loss of the TA by the S-CSCF.

Hasan describes:

> A method of call control in a packet-switched radio telecommunication network that minimizes delays in launching a voice call from a first Internet Protocol (IP)-based mobile station (MS) to a second IP-based MS. The method includes the steps of preventing voice traffic from being routed to an Internet Service Provider (ISP), and setting up an optimized path for voice traffic from the first MS to the second MS. The optimized path may be set up by creating a shortest route tunnel between a first serving GPRS service node (SGSN1) serving the first MS and a second SGSN (SGSN2) serving the second MS. Alternatively, the tunnel may be established between the base station controllers (BSCs) of each MS's serving radio base station.

(Abstract). Thus, Hasan merely relates to optimized routing. Hasan fails to teach, suggest, or describe receiving the TA from the HSS in response to a loss of the TA by the S-CSCF, as recited in Claims 1, 8, and 29.

B. Regarding independent Claims 5 and 12

Independent Claim 5 recites in part:

> receiving, at a Serving-Call State Control Function (S-CSCF), a registration request from a subscriber, wherein the registration request comprises a Transport Address (TA), and further wherein the TA comprises a Care of Address of the subscriber;
>
> storing the TA in a non-volatile memory of the S-CSCF; and
>
> restoring the TA to the S-CSCF from the non-volatile memory in response to a loss of the TA by the S-CSCF.

Independent Claim 12 recites in part:

> store the TA in a non-volatile memory at the S-CSCF; and
>
> restore the TA to the S-CSCF from the non-volatile memory in response to a loss of the TA by the S-CSCF.

Neither Hasan or Foti teaches restoring the TA to the S-CSCF from the non-volatile memory at the S-CSCF in response to a loss of the TA by the S-CSCF, as recited in Claims 5 and 12. Moreover, neither Hasan or Foti teaches that the TA comprises a Care of Address of the subscriber, as recited in Claim 5.

1. The Examiner failed to address relevant features presented in Claims 5 and 12.

First, Applicants note that the Examiner failed to address relevant features presented in Claims 5 and 12. The Examiner only addressed storing and restoring the TA in relation to the HSS, as recited in Claims 1, 8, and 29. However, the Examiner did not address storing and restoring the TA in relation to the non-volatile memory at the S-CSCF, as recited in Claims 5 and 12. For at least this reason, Applicants submit that the rejection of Claims 5 and 12 should be withdrawn.

2. Restoring the TA to the S-CSCF from the non-volatile memory at the S-CSCF in response to a loss of the TA by the S-CSCF

In addition, even if these features were addressed, Hasan and Foti fail to teach or suggest such features. Hasan states "all CSCF records for H.323-registered clients include an IP address, the E.164, the SGSN address, and optionally the IMSI for enhanced tracking of MS activities." (Col. 4, lines 12-14). Thus, Hasan teaches a CSCF which keeps records of H.323 clients. However, Hasan does not teach restoring the TA to the S-CSCF from the non-volatile memory in response to a loss of the TA by the S-CSCF.

Foti states "a location server that stores a transport address for the called MS." (Emphasis added through underlining). Foti further states "a Home Network 26 includes ... a Home CSCF 28, and a Location Server 29...., a Visited CSCF.... (Col. 3, lines 46-47; with emphasis added through underlining). Therefore, Foti teaches a location server, which is distinct from the CSCFs, "that stores a transport address for the called MS." As such,

Applicants respectfully submit that Foti does not teach, suggest, or describe storage of a transport address stored in non-volatile memory of a S-CSCF. Moreover, Applicants submit that Foti does not teach, suggest, or describe restoring the TA to the S-CSCF from the non-volatile memory in response to a loss of the TA by the S-CSCF, as recited in Claims 5 and 12.

3. TA comprises a Care of Address

Claim 5 recites that "the TA comprises a Care of Address of the subscriber." As discussed above, the Examiner failed to address this feature in the outstanding Office Action. In addition, even if this feature was addressed, Hasan and Foti fail to teach or suggest such a feature. The Examiner correctly recognized the deficiencies of Hasan and Foti by stating on page 5 that "the combination of Hasan and Foti does not specifically disclose of the subscriber comprises a current Care of Address of a subscriber." Thus, the Examiner admitted that such a feature is not taught by Hasan and Foti. As such, Applicants submit that the rejection of Claim 5 should be withdrawn because Hasan and Foti do not teach all the features presented in the claim.

As discussed above, Hasan and Foti fail to teach, suggest, or disclose all of the elements of at least Claims 1, 5, 8, 12, and 29. An obviousness rejection cannot be properly maintained where the references used in the rejection do not disclose all of the recited claim elements. Therefore, Applicants respectfully request withdrawal of the rejections of Claims 1, 5, 8, 12, and 29. Claim 32 depends form Claim 29. Therefore, Applicants respectfully request withdrawal of the rejection of Claims 1, 5, 8, 12, 29, and 32.

III. Rejection of Claims 3, 4, 7, 10, 11, and 14 under 35 U.S.C. § 103(a)

In section 4 of the Office Action, Claims 3, 4, 7, 10, 11, and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hasan in view of Foti and further in view of U.S. Patent No. 6,163,532 to Taguchi et al. (Taguchi). Applicants respectfully traverse this rejection.

As discussed in Section II., Hasan and Foti fail to teach all of the elements of Claims 1, 5, 8, and 12. Taguchi is directed toward "a method of packet data transmission in a mobile radio data communication system which can be used in a virtual network across a mobile

communications network and a LAN." (Col. 1, lines 7-10). Applicants respectfully submit that Taguchi does not teach, suggest, or describe any of the elements discussed above in Section II. relative to Claims 1, 5, and 8. As such, the combination of Hasan, Foti, and Taguchi does not disclose each of the elements recited in independent Claims 1, 5, 8, and 12. Because Claims 3, 4, 7, 10, 11, and 14 depend from one of Claims 1, 5, 8, and 12, Applicants respectfully request withdrawal of the rejection of dependent Claims 3, 4, 7, 10, 11, and 14.

IV. Rejection of Claim 31 under 35 U.S.C. § 103(a)

In section 5 of the Office Action, Claim 31 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Hasan in view of Foti and further in view of U.S. Patent No. 6,163,532 to Taguchi et al. (Taguchi). Applicants notes that the body of the rejection of Claim 31 relies on U.S. Patent No 6,732,177 to Roy (Roy). Since the rejection relies on Roy, Applicants assume that the Examiner made a typographical error and meant to include Roy instead of Taguchi. As such, Applicants are assuming that the Examiner meant to assert that Claims 31 is unpatentable over Hasan in view of Foti and further in view of Roy. However, clarification in the next Office Action would be appreciated. Applicants respectfully traverse this rejection.

As discussed in Section II., Hasan and Foti fail to teach all of the elements of Claim 1. Roy is directed toward an "intelligent signaling scheme for ... an H.323-based mobility architecture for real-time mobile multimedia communications and conferencing. (Abstract). Applicants respectfully submit that Roy does not teach suggest, or describe any of the elements discussed above in Section II. As such, the combination of Hasan, Foti, and Roy does not disclose each of the elements recited in independent Claim 1. Because Claim 31 depends from Claim 1, Applicants respectfully request withdrawal of the rejection of dependent Claim 31.

Applicants believe that the present application is in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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